

BRODY REID, ESQ.
PARTNER

BRAD GOODWIN, ESQ.
PARTNER

DUNCAN REID, ESQ.
PARTNER



REIDGOODWIN
ATTORNEYS AND COUNSELORS AT LAW

4116 FITZHUGH AVENUE • RICHMOND, VA 23230

T) 804.415.7800 • F) 804.415.7560

REIDGOODWIN.COM

BROOKE T. ALEXANDER, ESQ.
ATTORNEY

CASEY M. ARIAIL, ESQ.
ATTORNEY

RACHEL BRADSHAW, ESQ.
ATTORNEY

March 29, 2017

SENT VIA U.S. MAIL

Interworks Unlimited
Bruce Yoon, Registered Agent
2418 Peck Road
City of Industry, CA. 90601

Re: Our Client: Sheri Wade
Injury Date: 01/08/2017
Location: Richmond, Virginia, USA
Product: Interworks Unlimited High Roller Hoverboard Smart-C
Manufacturer: Hangzhou Chic Intelligent Technology Co., Ltd
Name of Product: Electric Balancing Scooter
Serial Number: 64091610120117
QVC Purchase Number: 4944135228
Order Date: 12/12/2016

Dear Sir/Madam:

Please be advised that Mrs. Sheri Wade has retained this firm, Reid Goodwin PLC, to represent her interests regarding injuries she sustained while using the above product she purchased from QVC on December 12, 2016. This letter will serve as written notification of our intention to seek recovery for our client under the liability provisions of your insured's general liability policy. We hereby assert our attorney's lien pursuant to Virginia Code Section 54.1-3932, as amended, against any and all proceeds due our client.

In the event it becomes necessary to litigate this matter, please take all appropriate measures to preserve any and all evidence pertaining to this accident. Please provide me with written notification of your receipt of this letter. Thank you in advance for your cooperation. I look forward to working with you in this matter. Should you wish to contact me to discuss the matter, my number is (804) 415-7800.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Bradshaw', with a long, sweeping horizontal line extending to the right.

Rachel Bradshaw, Esq.

RB/ma

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The likelihood of litigation regarding Mrs. Wade's injuries due to your products malfunction is apparent, therefore, please preserve and put a "litigation hold" on any and all evidence, including electronically stored information ("ESI"), pertaining to this incident including but not limited to:

- 1) Copies of any and all photographs regarding this incident;
- 2) Copies of any statements, written or recorded, which was given to you by any party involved or any witnesses;

- 3) Copies of any and all manufacturing and assembly reports, test logs, and safety checklists involving the above product;
- 4) Copies of any supervisor's report or investigation of this incident or similar incidents involving the above product;
- 5) Copies of any surveillance videos that may have recorded the incident or similar incidents;
- 6) Copies of any employee handbooks, employee guidelines, employee code of conduct, or employee rule book for your employees on the date of the incident or before;
- 7) Copies of any documents executed, signed, reviewed, presented, or shown to Sheri Wade;
- 8) Copies of any cleaning schedules , maintenance, repair, or service work performed in the area of manufacturing;
- 9) Copies of any warnings provided to the consumer regarding this product;
- 10) Copies of any personnel file for all persons or employees involved in this incident;
- 11) Copies of all documents relating to any prior incidents or investigations involving this product;
- 12) All e-mails and ESI relating to the incident of January 08, 2017, and any incidents or investigations involving Sheri Wade;
- 13) Any and all evidence that pertains to this case.

Thank you for your prompt attention to this matter.

Very truly yours,



Rachel Bradshaw, Esq.

RB/ma